

SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
Bruce E. Clark
Andrew G. Dietderich
Robinson B. Lacy

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____	X	
In re	:	Chapter 11 Case No.
	:	08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC., et. al.,	:	(Jointly Administered)
	:	
Debtors.		

_____ **X**

**VERIFIED STATEMENT OF SULLIVAN & CROMWELL LLP
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Sullivan & Cromwell LLP (“Sullivan & Cromwell”), a law firm maintaining offices at 125 Broad Street, New York, New York, 10004, makes this verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) as follows:

1. Sullivan & Cromwell separately advises and otherwise represents various creditors and/or equity security holders (collectively, the “Creditors”) who may hold claims against and/or interests in the debtors and debtors in possession (collectively, the “Debtors”) in connection with the above-captioned cases (the “Cases”).

2. The names and addresses of Creditors that Sullivan & Cromwell represents in connection with these Cases are as set forth below:

- a. Giants Stadium LLP
Meadowlands Sports Complex
50 State Route 120
East Rutherford, New Jersey 07073
- b. Canary Wharf Group plc
One Canada Square
Canary Wharf, London E14 A5AB
United Kingdom
- c. VeriFone, Inc.
2099 Gateway Place, Suite 600
San Jose, California 95110
- d. Barclays Capital Inc.
745 Seventh Avenue
New York, New York 10019

3. The nature and amount of the claims and interests of the foregoing Creditors are as set forth in the proofs of claims and/or interests, requests for payment of administrative expenses, or motions filed in these Cases.

4. Each Creditor separately requested that Sullivan & Cromwell represent it in connection with the Cases. Sullivan & Cromwell holds no ownership interests in the claims of any of the Creditors described in paragraphs 2 and 3 above.

5. If and to the extent Sullivan & Cromwell makes an appearance in these Cases on behalf of any other creditors, Sullivan & Cromwell will supplement this Verified Statement in accordance with Bankruptcy Rule 2019.

6. Sullivan & Cromwell holds claims against the Debtors as set forth in the proofs of claim filed by Sullivan & Cromwell in these Cases.

Dated: New York, New York
February 23, 2011

SULLIVAN & CROMWELL LLP

By: /s/ Bruce E. Clark
Bruce E. Clark
Robinson B. Lacy
Andrew G. Dietderich
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____	x	
In re	:	Chapter 11 Case No.
	:	08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC., et. al.,	:	(Jointly Administered)
	:	
Debtors.	:	
_____	x	

I, Bruce E. Clark, a member of Sullivan & Cromwell LLP, a law firm maintaining its offices at 125 Broad Street, New York, New York, 10004, declare under penalty of perjury that the attached statement under Rule 2019 of the Federal Rules of Bankruptcy Procedure (the "Rule 2019 Statement") is true and correct to the best of my knowledge and that the filing of the Rule 2019 Statement on behalf of Sullivan & Cromwell LLP has been authorized.

Dated: New York, New York
February 23, 2011

SULLIVAN & CROMWELL LLP

By: /s/ Bruce E. Clark
Bruce E. Clark
Andrew G. Dietderich
Robinson B. Lacy
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588